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**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Implement
Electric Utility Wildfire Mitigation Plans
Pursuant to Senate Bill 901 (2018).

Rulemaking 18-10-007
(Issued October 25, 2018)

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E) COMPLAINT
FILING REGARDING IN-LANGUAGE OUTREACH IN RESPONSE TO
ADMINISTRATIVE LAW JUDGE RULING**

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Dated: December 29, 2020

Attorneys for
PACIFIC GAS AND ELECTRIC COMPANY

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OF THE STATE OF CALIFORNIA**

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**PACIFIC GAS AND ELECTRIC COMPANY’S (U 39 E) COMPLIANCE
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ADMINISTRATIVE LAW JUDGE RULING**

In compliance with the *Administrative Law Judge’s Ruling Regarding Compliance Filings Submitted in Response to Decision 20-03-004 Related to In-Language Outreach Before, During and After a Wildfire and Surveys of Effectiveness of Outreach*, dated August 21, 2020 issued in Rulemaking (R.) 18-10-007 (ALJ Ruling), Pacific Gas and Electric Company (PG&E) respectfully submits this Compliance Filing that addresses languages that might be considered minority languages in particular countries but that have more than 1,000 speakers in PG&E’s territory.

I. BACKGROUND

Decision (D.) 20-03-004 (Decision) adopted requirements for California’s investor-owned utilities (IOUs) to conduct in-language outreach before, during, and after a wildfire, and submit surveys of the effectiveness of past outreach efforts. The requirements were adopted pursuant to the Wildfire Mitigation Plan (WMP) statute, Assembly Bill 1054 (2019) and Public Utilities Code Section 8386(c)(16)(B), which call for “[p]lans for community outreach and public awareness before, during, and after a wildfire, including language notification in English, Spanish, and the top three primary languages used in the state other than English or Spanish, as determined by the commission based on the United States Census data.”

The Decision required outreach to communities and the public before, during, and after a wildfire in all languages “prevalent” in the IOUs’ respective service territories. The Decision determined that a language is “prevalent” if it is spoken by 1,000 or more persons in the territory

of an IOU. The Decision provided guidance on how the utilities were to determine which languages are prevalent, using Census data with refinements, as set forth in Appendix A to the Decision. The Decision also required IOUs and small multi-jurisdictional utilities (SMJU) to conduct outreach in indigenous languages Mixteco and Zapoteco regardless of prevalence.

On May 15, 2020, PG&E filed a Tier 1 Advice Letter (4249-G/5827-E) and its Community Outreach Budget and Workplan compliance filing (Compliance Filing), which explained its in-language outreach approach and offerings.

On August 21, 2020, Administrative Law Judge Fogel issued the ALJ Ruling that approved PG&E's in-language plans of each with conditions for the 2020 fire season. The ALJ Ruling adopted the California Environmental Justice Alliance's (CEJA) use of the Public Use Microdata Sample (PUMS) U.S. Census data for the IOUs' analysis of languages, which added Hindi, Thai, and Portuguese¹ as languages covered by the Decision.²

The ALJ Ruling determined that CEJA's data pointed to several languages that might be considered minority languages in particular countries but that have more than 1,000 speakers in one or more large IOU's territory. The ALJ Ruling indicated that the large IOUs did not show, in their Compliance Filings, that speakers of minority languages in a particular country or region also speak the more prevalent or dominant language of the country or region. The ALJ Ruling determined that the Decision applies to the former languages if spoken by more than 1,000 speakers in the relevant IOU's service territory. As such, the ALJ Ruling required each IOU to submit a compliance filing addressing the following languages, if applicable:

1. All IOUs shall determine whether their plans to use Tagalog will provide outreach to speakers of Filipino languages Ilocano and Cebuano, if CEJA's submission identified 1,000 or more speakers of the latter languages in the subject IOU's service territory.

¹ The ALJ Ruling added Hmong for Southern California Edison Company (SCE). PG&E already included Hmong on its list of covered languages.

² ALJ Ruling, p.4

2. All IOUs shall determine whether their plans to use Hindi, Urdu or Arabic will provide outreach to speakers of Indian subcontinent languages Punjabi, Gujarati, Bengali, Tamil and Telugu, if CEJA's submission identified 1,000 or more speakers of the latter languages in the subject IOU's service territory.
3. All IOUs shall determine whether their plans to use Farsi and Arabic provide outreach to speakers of Pashto, if CEJA's submission identified 1,000 or more speakers of Pashto in the subject IOU's territory.
4. All IOUs shall determine whether their plans to use Chinese languages Cantonese and Mandarin will provide outreach to speakers of Min Nan Chinese, if CEJA's submission identified 1,000 or more speakers of Min Nan Chinese in the subject IOU's territory.

II. DISCUSSION

Based on the PUMS U.S. Census data as submitted by CEJA and referenced in the ALJ Ruling, PG&E finds that Filipino languages Ilocano³ and Cebuano;⁴ Indian subcontinent languages⁵ Gujarati,⁶ Bengali,⁷ Tamil⁸ and Telugu;⁹ Pashto;¹⁰ and Min Nan Chinese¹¹ are prevalent languages in its territory.

PG&E confirms that its outreach plans provide outreach to speakers of these languages through its Call Center translation services provided by Language Line Services.¹²¹³

According to Language Line Services, for spoken Min Nan Chinese, Min Nan refers to a group of linguistically similar and historically related Sinitic languages. Alternate names for Chinese Min Nan include Banlamgi, Minnan, Southern Fujian, Southern Min. There is also a wide-range

³ 6,249 customers, per PUMS U.S. Census Data

⁴ 2,650 customers, per PUMS U.S. Census Data

⁵ PG&E has included Punjabi as one of its prevalent languages in its Community Outreach Budget and Workplan compliance filing (Compliance Filing).

⁶ 5,246 customers, per PUMS U.S. Census Data

⁷ 2,262 customers, per PUMS U.S. Census Data

⁸ 6,361 customers, per PUMS U.S. Census Data

⁹ 8,155 customers, per PUMS U.S. Census Data

¹⁰ 2,382 customers, per PUMS U.S. Census Data

¹¹ 5,800 customers, per PUMS U.S. Census Data

¹² See Appendix 1 for the complete list of language translations available through PG&E's Call Center.

¹³ See Appendix 2 for a twelve month summary of translation services through PG&E's Call Center.

of dialects (e.g., over 20) associated with Min Nan. Knowing from where the customer who speaks Min Nan hails is the best way to know what dialect that most accurately reflects their spoken Min Nan. Language Line Services state that Taiwanese closely resembles Min Nan, and speakers of Min Nan Chinese can understand Taiwanese. Additionally, Fukienese, Fuzhou, or Chaochow language are also likely options that speakers of Min Nan Chinese can understand. Regarding written Min Nan Chinese, either Simplified Chinese (for someone from Southern Fujian Province) or Traditional Chinese (for someone from China pre-WWII or from Taiwan) meet the needs of Min Nan Chinese speakers. Language Line Services offers translations in Taiwanese, Fukienese, Fuzhou, and Chaochow, in addition to Filipino languages Ilocano and Cebuano; and Indian subcontinent languages Gujarati, Bengali, Tamil and Telugu; Pashto. In addition to our Call Center translation services, PG&E has relationships with multicultural Community Based Organizations (CBO) that can also support these minority languages as necessary. PG&E fully describes its extensive translation services in its Community Outreach Budget and Workplan compliance filing, including the use of the Call Center translation services¹⁴ and multicultural CBOs.¹⁵

PG&E sought to determine whether limited English proficiency customers who speak Filipino languages Ilocano and Cebuano speak Tagalog; Indian subcontinent languages Gujarati, Bengali, Tamil and Telugu also speak Hindi, Urdu or Arabic; and Pashto speakers also speak Farsi and Arabic. Findings were inconclusive as PG&E could not find any reliable publicly available data to address this question. Moving forward, PG&E recommends the Commission conduct a third-party evaluation study to determine whether limited English proficiency speakers who speak Filipino languages Ilocano and Cebuano; Indian subcontinent languages¹⁶ Gujarati, Bengali, Tamil and Telugu; Pashto; and Min Nan Chinese also speak Tagalog; Hindi, Urdu or Arabic; Farsi and Arabic; or Cantonese and Mandarin, respectively.

¹⁴ Compliance Filing, pp.12-13 and Appendix 1.

¹⁵ Compliance Filing, pp.17-18

¹⁶ PG&E has included Punjabi as one of its prevalent languages in its Community Outreach Budget and Workplan compliance filing.

III. CONCLUSION

PG&E appreciates the opportunity to provide clarity on whether its 2020 Community Outreach and Awareness Workplan provides outreach to speakers of Filipino languages Ilocano and Cebuano; Indian subcontinent languages Gujarati, Bengali, Tamil and Telugu; Pashto; and Min Nan Chinese. We are proud to serve the diverse citizens of California in the prevalent languages throughout our service territory.

Respectfully Submitted,

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Dated: December 29, 2020

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Appendix 1 – Languages Available by PG&E’s Language Line Services

The 250+ languages listed below are currently available for translation services to customers when contact PG&E’s call center, including at least eight indigenous languages from parts of Latin America: Akateko, K’iché, Mixteco, Napoletano, Quechua, Triqui, Tzotzil, Zapoteco. These languages are bolded in Table 1 below.

Table 1. PG&E Call Center Translation Service Languages Available

Acholi	Chaldean	Fuzhou	Italian
Afar	Chamorro	Ga	Jakartanese
Afrikaans	Chaochow	Gaddang	Jamaican Patois
Akan	Chin Falam	Gaelic-Irish	Japanese
Akateko	Chin Hakha	Gaelic-Scottish	Jarai
Albanian	Chin Mara	Garre	Javanese
Amharic	Chin Matu	Gen	Jingpho
Anuak	Chin Senthang	Georgian	Jinyu
Apache	Chin Tedim	German	Juba Arabic
Arabic	Chipewyan	German Penn. Dutch	Jula
Armenian	Chuukese	Gheg	Kaba
Assyrian	Cree	Gokana	Kamba
Azerbaijani	Croatian	Greek	Kam Muang
Bahasa	Czech	Gujarati	Kanjobal
Bahdini	Danish	Gulay	Kannada
Bahnar	Dari	Gurani	Karen
Bajuni	Dewoin	Haitian Creole	Kashmiri
Bambara	Dinka	Hakka-China	Kayah
Bantu	Duala	Hakka-Taiwan	Kazakh
Barese	Dutch	Hassaniyya	Kham
Basque	Dzongkha	Hausa	Khana
Bassa	Edo	Hawaiian	Khmer
Belorussian	Ekegusii	Hebrew	K’iché
Bemba	Estonian	Hiligaynon	Kikuyu
Benaadir	Ewe	Hindi	Kimiiru
Bengali	Farsi	Hindko	Koho
Berber	Fijian	Hmong	Korean
Bosnian	Fijian Hindi	Hunanese	Krahn
Bravanese	Finnish	Hungarian	Krio
Bulgarian	Flemish	Icelandic	Kunama
Burmese	French	Igbo	Kurmanji
Cantonese	French Canadian	Ilocano	Kyrgyz
Catalan	Fukienese	Indonesian	Laotian
Cebuano	Fulani	Inuktitut	Latvian

Liberian Pidgin English	Pampangan	Swahili
Lingala	Papiamento	Swedish
Lithuanian	Pashto	Sylhetti
Luba-Kasai	Plautdietsch	Tagalog
Luganda	Pohnpeian	Taiwanese
Luo	Polish	Tajik
Maay	Portuguese	Tamil
Macedonian	Portuguese Brazilian	Teluga
Malay	Portuguese Cape Verdean	Thai
Malayalam	Pugliese	Tibetan
Maltese	Pulaar	Tigré
Mam	Punjabi	Tigrigna
Mandarin	Putian	Toishanese
Mandinka	Quechua	Tongan
Maninka	Quichua	Tooro
Manobo	Rade	Triqui
Marathi	Rakhine	Turkish
Marka	Rohingya	Turkmen
Marshallese	Romanian	Tzotzil
Masalit	Rundi	Ukrainian
Mbay	Russian	Urdu
Mien	Rwanda	Uyghur
Mirpuri	Samoan	Uzbek
Mixteco	Sango	Vietnamese
Mizo	Seraiki	Visayan
Mnong	Serbian	Welsh
Mongolian	Shanghainese	Wodaabe
Moroccan Arabic	Shona	Wolof
Mortlockese	Sichuan Yi	Yemeni Arabic
Napoletano	Sicilian	Yiddish
Navajo	Sinhala	Yoruba
Nepali	Slovak	Yunnanese
Ngambay	Slovene	Zapoteco
Nigerian Pidgin	Soga	Zarma
Norwegian	Somali	Zo
Nuer	Soninke	Zyphe
Nupe	Sorani	
Nyanja	Spanish	
Nyoro	Sudanese Arabic	
Ojibway	Sunda	
Oromo	Susu	

Appendix 2 - Twelve Month Summary of PG&E Translation Services Used by Customers

The following table summarizes the language-specific translation services used by customers when contacting PG&E's contact centers over the course of twelve months (from January 2020 - December 2020 (as of December 21,2020)).

Language	Total 2020 ¹⁷ Translated Call Volume	Percentage of 2020 Translated Call Volume	Percent of Total 2020 Call Volume
Spanish	25545	42.18%	0.56%
Cantonese	13406	22.14%	0.29%
Mandarin	9222	15.23%	0.20%
Vietnamese	5485	9.06%	0.12%
Punjabi	1381	2.28%	0.03%
Russian	960	1.59%	0.02%
Portuguese	651	1.07%	0.01%
Korean	621	1.03%	0.01%
Arabic	545	0.90%	0.01%
Farsi	468	0.77%	0.01%
Hmong	392	0.65%	0.01%
Japanese	213	0.35%	0.00%
Tagalog	195	0.32%	0.00%
Cambodian	164	0.27%	0.00%
Dari	141	0.23%	0.00%
Hindi	120	0.20%	0.00%
Laotian	117	0.19%	0.00%
Toishanese	69	0.11%	0.00%
Armenian	64	0.11%	0.00%
Thai	51	0.08%	0.00%
Pashto	49	0.08%	0.00%
Nepali	42	0.07%	0.00%
Tigrinya	41	0.07%	0.00%
Urdu	40	0.07%	0.00%
Romanian	39	0.06%	0.00%
Mongolian	37	0.06%	0.00%
Amharic	35	0.06%	0.00%
French	34	0.06%	0.00%
Burmese	34	0.06%	0.00%
KHMER	30	0.05%	0.00%
Turkish	28	0.05%	0.00%
Bengali	25	0.04%	0.00%
Ukrainian	23	0.04%	0.00%
Portuguese Br.	19	0.03%	0.00%
Mixteco	19	0.03%	0.00%
Assyrian	19	0.03%	0.00%

¹⁷ As of December 21, 2020

Italian	18	0.03%	0.00%
Polish	18	0.03%	0.00%
TIGRIGNA	14	0.02%	0.00%
Greek	13	0.02%	0.00%
Mien	12	0.02%	0.00%
Indonesian	10	0.02%	0.00%
Bosnian	10	0.02%	0.00%
Mam	10	0.02%	0.00%
Croatian	8	0.01%	0.00%
Haitian Creole	7	0.01%	0.00%
Tongan	6	0.01%	0.00%
Hungarian	6	0.01%	0.00%
Gujarati	6	0.01%	0.00%
Ilocano	6	0.01%	0.00%
Karen	5	0.01%	0.00%
Yemeni Arabic	5	0.01%	0.00%
Tamil	5	0.01%	0.00%
Lingala	5	0.01%	0.00%
Uzbek	4	0.01%	0.00%
Oromo	4	0.01%	0.00%
Telugu	4	0.01%	0.00%
Taiwanese	4	0.01%	0.00%
Malayalam	4	0.01%	0.00%
Sudanese Arabic	3	0.00%	0.00%
Tibetan	3	0.00%	0.00%
Bulgarian	3	0.00%	0.00%
Somali	3	0.00%	0.00%
Hebrew	3	0.00%	0.00%
Malay	3	0.00%	0.00%
Akan	2	0.00%	0.00%
Uyghur	2	0.00%	0.00%
Fuzhou	2	0.00%	0.00%
SINHALA	2	0.00%	0.00%
Maay	2	0.00%	0.00%
Cebuano	2	0.00%	0.00%
Shanghainese	2	0.00%	0.00%
Samoan	2	0.00%	0.00%
Chin	1	0.00%	0.00%
Georgian	1	0.00%	0.00%
Portug.Creole	1	0.00%	0.00%
Tajik	1	0.00%	0.00%
LITHUANIAN	1	0.00%	0.00%
Chuukese	1	0.00%	0.00%
EWE	1	0.00%	0.00%
Sinhalese	1	0.00%	0.00%
Hunanese	1	0.00%	0.00%
Visayan	1	0.00%	0.00%
PORTUGUESE BRAZILIAN	1	0.00%	0.00%

IGBO	1	0.00%	0.00%
German	1	0.00%	0.00%
Tigre	1	0.00%	0.00%
Marshallese	1	0.00%	0.00%
SORANI	1	0.00%	0.00%
Krio	1	0.00%	0.00%
Fulani	1	0.00%	0.00%
K'Iche	1	0.00%	0.00%
Grand Total	60561	100.00%	1.33%